

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 7:24-cv-00033-DC-DTG

**UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE REPLY IN SUPPORT OF
DEFENDANT GOOGLE LLC'S MOTION TO TRANSFER VENUE**

Defendant Google LLC (“Google”) respectfully files this unopposed motion seeking to extend the date by which to file its Reply in Support of its Motion to Transfer Venue to the Northern District of California Under 28 U.S.C. § 1404(a) (the “Motion”). Google’s Motion was filed on July 10, 2024. Dkt. 44. Plaintiff VirtaMove, Corp.’s Notice of Venue Discovery was filed on July 15, 2024. Plaintiff VirtaMove, Corp.’s Opposition to the Motion was filed on October 3, 2024 (Dkt. 55), making Google’s reply due Thursday, October 10, 2024.

Google respectfully requests that the deadline to file its Reply in Support of Defendant Google’s Motion to Dismiss Amended Complaint be extended by seven (7) days to October 17, 2024. This extension is warranted to allow Google additional time to prepare its reply including in light of the unavailability of Google’s counsel. Plaintiff is not opposed to the seven-day extension of time.

DATED: October 7, 2024

Respectfully submitted,

/s/ David A. Perlson

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Counsel for Defendant Google LLC

CERTIFICATE OF CONFERENCE

Defendant's counsel, Andrew Mather, conferred by email with opposing counsel, Peter Tong, on October 4, 2024, concerning this Motion, to which opposing counsel responded on October 6, 2024 that Plaintiff was not opposed to the request for additional time.

/s/ Katharine L. Carmona
Katharine Lee Carmona

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on October 7, 2024, I electronically filed the foregoing "UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE REPLY IN SUPPORT OF DEFENDANT GOOGLE LLC'S MOTION TO TRANSFER VENUE" document using the CM/ECF system, which will send notification of such filing to counsel for all parties of record.

/s/ Katharine L. Carmona
Katherine Lee Carmona